

BEFORE THE  
POSTAL REGULATORY COMMISSION

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Inquiry Concerning City Carrier Costs

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Docket No. PI2017-1

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MOTION OF UNITED PARCEL SERVICE, INC. TO EXTEND  
FILING DEADLINE  
(August 23, 2017)

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United Parcel Service (“UPS”) hereby respectfully requests that the deadline for filing comments in the PI2017-1 docket regarding the Postal Service’s progress in investigating the data required for a single equation city carrier letter route cost model, as well as reviewing the SPR cost model for street time,<sup>1</sup> be extended until September 8, 2017, on the grounds set forth herein.

On August 18, 2017, the Postal Service filed a 40-page report with extensive new statistical and econometric analysis, including 16 tables, less than two weeks before the deadline for comments in this docket.<sup>2</sup> The report also compares the results of the Postal Service’s research into a top-down model with those underlying the model established in Docket No. RM2015-7.<sup>3</sup> These analyses, which include or rely upon at least 13 new regression analyses, rely on newly available data and programs that UPS and other possible commenters are seeing for the first time.

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<sup>1</sup> Notice and Order Establishing Docket Concerning City Carrier Special Purpose and Letter Route Costs and to Seek Public Comment, Dkt. No. PI2017-1 (May 31, 2017) (“Order No. 3926”), at 1-3.

<sup>2</sup> Report on Research Into the Ability of a Top-Down Model To Accurately Estimate City Carrier Street Time Variabilities, Dkt. No. PI2017-1 (Aug. 18, 2017).

<sup>3</sup> See, e.g., *id.* at 23-24.

In the August 18 filing, the Postal Service has argued that there are various statistical problems with the data that have implications for the results under their proposed approach.<sup>4</sup> UPS and its external consultants would like additional time to evaluate and understand the nature of the claimed statistical issues, to conduct its own comparison with the established model, to assess the impacts the statistical issues have on the pilot estimation results, and if necessary, to consider alternative solutions to address them. The seven business days between the filing of this report and the original August 29, 2017 deadline for comments in this docket are insufficient time to achieve these aims.<sup>5</sup>

Because of the amount of material that would need to be analyzed, UPS requests that the Commission extend the comment deadline to allow commenters adequate time to consider and evaluate the Postal Service's responses. Accordingly, UPS requests that the Commission extend the deadline for filing comments to September 8, 2017. UPS submits that a modest extension of the comment deadline will not significantly delay the proceeding or adversely affect any participant.

Respectfully submitted,

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<sup>4</sup> *Id.* at 38-39.

<sup>5</sup> UPS also notes that the Postal Service does not appear to have provided the programs or output underlying the analysis discussed in pages 5 through 9 of its report.

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